

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

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Case No.: 1:22-cv-1032 (PKC) (JRC)

**PLAINTIFF'S EXHIBIT LIST
FOR MAY 29, 2024
CONTEMPT HEARING**

Plaintiff IME WatchDog, Inc. (hereinafter "Plaintiff") respectfully submits the instant exhibit list pursuant to this Court's Orders dated April 17, 2024 and May 7, 2024 in advance of the hearing scheduled for Wednesday, May 29, 2024 at 10:00 AM.

- 1) Defendant Safa Abdulrahman Gelardi's ("Safa") Deposition Transcript dated February 2, 2023 (ECF Docket Entry [154-4](#))
- 2) Safa's Deposition Transcript dated February 3, 2023 (ECF Docket Entry [154-5](#))
- 3) Exhibit A to Plaintiff's letter motion for extension of time (ECF Docket Entry [319-1](#))
- 4) Plaintiff's second supplemental Declaration in further support of motion for contempt with accompanying exhibits A through P (ECF Docket Entry [321](#))
- 5) Safa's Deposition Exhibit 10 (V&S Holdings)
- 6) Exhibit A through I to Plaintiff's Motion for Attorneys' Fees (ECF Docket Entries [262-1](#), [262-2](#), [262-3](#), [262-4](#), [262-5](#), [262-6](#), [262-7](#), [262-8](#), and [262-9](#))
- 7) Exhibits A and B to Defendants' Response in Opposition to Renewed Motion for Attachment (ECF Docket Entries [274-1](#) and [274-2](#))

- 8) Defendants' Letter Response in Opposition to Plaintiff's Motion for Contempt (ECF Docket Entry [328](#))
- 9) April 4, 2022 hearing transcript (ECF Docket Entry [46-1](#))
- 10) March 27, 2023 hearing transcript (ECF Docket Entry [197-5](#))
- 11) May 4, 2023 hearing transcript (ECF Docket Entry [219-1](#))
- 12) Giant Partners, Inc.'s production of documents in response to subpoena (available by link in ECF Docket Entry [326](#)) together with Certification of Authenticity
- 13) Declaration of Safa A. Gelardi dated April 27, 2023 (ECF Docket Entry [202-3](#))
- 14) Declaration of Vito Gelardi dated April 27, 2023 (ECF Docket Entry [202-4](#))
- 15) Declaration of Eugene Liddie dated February 27, 2024 (ECF Docket Entry [282](#))
- 16) Declaration of Safa A. Gelardi dated May 10, 2024 (ECF Docket Entry [328-2](#))
- 17) Declaration of Vito Gelardi dated May 10, 2024 (ECF Docket Entry [328-3](#))
- 18) Website Sales Agreement (ECF Docket Entry [202-2](#))

Dated: Lake Success, New York
May 15, 2024

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

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IME WatchDog, Inc.

Dated: Jamaica, New York
March 8, 2024

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*Additional Attorneys for Plaintiff
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VIA ECF
All counsel of record